

REMARKS

Reconsideration of the application in view of the above amendments and the following remarks is respectfully requested. Claims 1, 2, and 13 have been amended. No claims have been cancelled or added. Claims 1-24 are currently pending in the application.

Claim Objections

Claim 2 was objected to because the term “targe” should have read “target.” The appropriate amendment has been made. Withdrawal of the objection is therefore respectfully requested.

Amendments to claims 1 and 13

The amendments to claims 1 and 13 are made *to clarify* that the result document approximates the target document. The amendments are not made for reasons relating to patentability. Therefore, claims 1 and 13 are entitled to a full range of equivalents under the doctrine of equivalents.

Claim Rejections – 35 U.S.C. § 102(e)

In the Office Action, the Examiner rejected Claims 1, 2, 4-14, and 16-24 under 35 U.S.C. § 102(e) as being anticipated by Sundaresan (U.S. Patent No. 6,487,566). This rejection is respectfully traversed.

Independent claim 1

With regard to independent claim 1, there is recited:

A computer-implemented method for generating a transformation document, comprising:
analyzing a target document; and
automatically generating, based at least upon said target document, a
transformation document, said transformation document capable of being
processed in conjunction with a source document to transform said source
document into a result document that at least approximates said target
document (emphasis added).

Claim 1 provides an advantageous method for automatically generating a transformation document. According to claim 1, a computer-implemented method analyzes a target document and automatically generates, based upon that target document, a transformation document that can be used to transform other documents. Traditionally, the transformation documents were produced manually; however, with the method of claim 1, these transformation documents can now be generated automatically, based at least partially upon a target document.

Such a method is neither disclosed nor suggested by Sundaresan. Instead, Sundaresan discloses a method for transforming a source XML document into a result XML document. More specifically, in Sundaresan, a set of rule specifications 114 (Fig. 1) are provided. Based on the rule specifications, Java class specifications 116 are created. When instantiated, the Java class specifications 116 give rise to a set of transformation components 118, 120, 122. These transformation components are then applied to an input XML document 124 to derive an output XML document 126. Col. 5, lines 41-50. In this manner, a result XML document 126 is derived by applying a set of transformation components 118, 120, 122 to a source XML document 124.

While Sundaresan addresses the generally similar subject matter of document transformations, it should be noted that Sundaresan approaches the subject matter from a very different angle than that of claim 1. As discussed above, Sundaresan teaches a method in which, given a set of rule specifications and a source XML document, a result XML document is derived. Thus, Sundaresan starts with the rule specifications and the source XML document, and ends with the result XML document. In sharp contrast, the method of claim 1 discloses a somewhat reverse process in which a target document (which may be viewed as a result document) is provided. Based on the target document, a transformation document is automatically generated. Once generated, the transformation document can be processed with a source document to derive a result document that at least approximates the target document. Thus, in claim 1, the method starts with a target (result) document, and ends with a transformation document. From this discussion, it is clear that the methods are very different. Nowhere in Sundaresan is it disclosed or suggested that a transformation document be automatically generated based upon a target or result document.

In rejecting claim 1, the Examiner contended that: (1) the XML input 124 of Sundaresan is a target document; (2) the pattern matching component 118 is a transformation document; and (3) the pattern matching component 118 is automatically generated based upon the XML input 124. Applicant respectfully disagrees.

First of all, it should be noted that the pattern matching component 118 can in no way be interpreted as a "document". Rather, it is an object that is instantiated at run time to perform a pattern matching function. Given that the pattern matching component 118

is a functional component, Applicant cannot see how it can be interpreted as a "transformation document" as that term is used in claim 1.

Another point to note is that, even if the pattern matching component 118 could be interpreted as a transformation document, it is in no way automatically generated based upon the XML input 124, as contended by the Examiner. Rather than being generated based upon the XML input 124, the pattern matching component 118 is applied to the XML input 124 to derive the XML output 126. Thus, rather than a target document, the XML input 124 is more appropriately interpreted as a source document. Overall, the Examiner's reading of the Sundaresan reference onto claim 1 cannot be reasonably supported.

As argued above, Sundaresan neither discloses nor suggests the automatic generation of a transformation document based at least upon a target document, as recited in claim 1. For at least this reason, Applicant submits that claim 1 is patentable over Sundaresan.

Applicant further submits that dependent claims 2, and 4-12, which depend from claim 1 and which recite further advantageous aspects of the invention, are likewise patentable over Sundaresan for at least the reasons given above in connection with claim 1.

Claims 13, 14, and 16-24 include limitations similar to claims 1, 2, and 4-12, except in the context of computer-readable media. It is therefore respectfully submitted that claims 13, 14, and 16-24 are patentable over Sundaresan for at least the reasons given above with respect to claims 1, 2, and 4-12.

Claim Rejections – 35 U.S.C. §103(a)

In the Office Action, the Examiner rejected claims 3 and 15 under 35 U.S.C. §103(a) as being unpatentable over Sundaresan in view of Nasr (U.S. Patent No. 6,263,332). This rejection is respectfully traversed.

Like Sundaresan, Nasr discloses a method for applying queries and transformation rules to source documents to derive result documents. More specifically, Nasr teaches “retrieving information in a first markup language through a query engine and presenting the information in any required markup language. A user inputs a query and may invoke a number of transformation sequences,” which “contain a markup language pattern and an action, which may include transforming the tags” (Abstract).

The Examiner relies on Nasr to show that the transformation document of claim 1 is an XSLT document as recited in claim 3. For the sake of argument, it will be assumed that Nasr discloses the subject matter as contended by the Examiner. Even if this were true, however, the combination of Sundaresan and Nasr still would not produce the method of claim 3. As argued above in connection with claim 1 (from which claim 3 depends), Sundaresan fails to disclose or suggest a number of aspects of claim 1, such as automatically generating a transformation document. Nasr discloses that a user *supplies* a transformative sequence in the form of an XSL specification (Col. 6, lines 30-31). Thus, Nasr also does not teach or suggest automatically generating a transformation document. Therefore, the combination of Sundaresan and Nasr would still have this shortcoming. As a result, even if the references were combined (assuming for the sake of argument that it would have been obvious to combine the references), they still would not

disclose every element of claim 3. Thus, Applicant submits that claim 3 is patentable over Sundaresan and Nasr.

Claim 15 includes limitations similar to claim 3, except in the context of computer-readable media. It is therefore respectfully submitted that claim 15 is patentable over Sundaresan and Nasr for at least the reasons given above with respect to claim 3.

Conclusion

For the reasons given above, Applicant submits that the pending claims are patentable over the art of record, including the art cited but not applied. Accordingly, allowance of all pending claims is respectfully solicited.

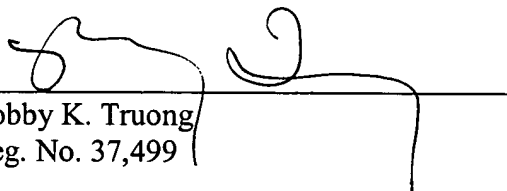
The Examiner is invited to telephone the undersigned at (408) 414-1080 to discuss any issue that may advance prosecution.

No fee is believed to be due specifically in connection with this Reply. The Commissioner is authorized to charge any fee that may be due in connection with this Reply to our Deposit Account No. 50-1302.

Respectfully submitted,

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Dated: July 16, 2004


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I hereby certify that this correspondence is being deposited with the United States Postal Service as first class mail in an envelope addressed to: Mail Stop Amendment, Commissioner for Patents, P. O. Box 1450, Alexandria, VA 22313-1450.

on July 16, 2004

